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Attorneys for Objector Douglas W. St. John

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Master File No. 3:07-cv-5944 JST

MDL No. 1917

**DECLARATION OF ATTORNEY
ANDREA VALDEZ IN SUPPORT OF
DOUGLAS W. ST. JOHN'S MOTION
FOR ATTORNEY'S FEES AND
EXPENSES**

This Document Relates To:
All Indirect Purchaser Actions

Judge: Hon. Jon S. Tigar

1 I, Andrea Valdez, declare and state as follows:

2 1. I am an attorney duly licensed in the State of California (admitted 2005). I represent
3 Douglas W. St. John, a resident of the State of Mississippi, in connection with the above-captioned
4 matter.

5 2. I make this declaration in support of Objector Douglas W. St. John's Motion for
6 Attorney's Fees and Expenses.

7 3. I have personal knowledge of the facts stated herein, and if called and sworn as a
8 witness, I would testify truthfully as follows:

9 **COUNSEL'S BACKGROUND, SKILL, AND EXPERIENCE**

10 4. I earned a B.A. from California State Polytechnic University – Pomona in 2001. I
11 earned a J.D. from Columbia Law School in 2005.

12 5. I practiced law as an associate at Fulbright & Jaworski LLP from October 2005 until
13 June 2012. From June 2012 until July 2015, I lived abroad and was not active in the practice of law. I
14 returned to private practice in September 2015.

15 6. I have significant experience litigating in California state and federal courts. I have
16 significant experience with class actions.

17 **LODESTAR CROSS-CHECK AND EXPENSES**

18 7. I served as a consulting attorney and local counsel for Mr. St. John in this matter. In
19 the course of this matter, I regularly provided strategy advice to Mr. St. John's lead counsel and
20 edited Mr. St. John's briefs. Because Mr. St. John is not seeking attorney's fees based on my work, I
21 am not submitting my time records.

22 8. I have reviewed the Declaration of Joseph Scott St. John ISO Objector Douglas W.
23 St. John's Motion for Attorney's Fees and Expenses.

24 9. Based on my experience as a senior associate at a large law firm, I believe the time
25 expended by Joseph St. John in litigating this matter is reasonable.

26 10. Based on my experience in the California legal market, I believe a non-contingent
27 hourly rate of \$500 to \$600 is reasonable for an attorney of Joseph St. John's background, skill, and
28 experience.

1 11. Based on my experience, I believe the expenses incurred by Mr. St. John are
2 reasonable.

3 12. Further declarant sayeth naught.
4

5 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED
6 STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.
7

8 Executed in Pasadena, California this 17th day of August, 2016.

9 /s/ Andrea Valdez
10 _____

11 ANDREA VALDEZ
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